

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

COACH, INC. and COACH SERVICES, INC.,

Plaintiffs,

v.

KATHLEEN A. DEPREZ both individually and
doing business as WWW.KATSBAGS.BIZ;
UNKNOWN WEBSITES 1-10; “JOHN DOES” 1-
10; and UNKNOWN ENTITIES 1-10,

Defendants.

Civil Action

No. 11 Civ. 0303 (LBS)

DEFENDANT’S ANSWER AND AFFIRMATIVE DEFENSES

Defendant, Kathleen A. Deprez, individually and doing business as www.katsbags.biz (“Defendant”), by and through her counsel, hereby answers the Complaint as follows:¹

1. Defendant denies the allegations contained in Paragraph 1 of the Complaint, except admits that Plaintiffs have purported to assert the claims identified in this paragraph.
2. Defendant denies the allegations contained in Paragraph 2 of the Complaint, except admits that Plaintiffs purport to assert jurisdiction pursuant to 15 U.S.C. §1121 and 28 U.S.C. §§1331 and 1338.
3. Defendant denies the allegations contained in Paragraph 3 of the Complaint, except admits that Plaintiffs purport to assert supplemental jurisdiction pursuant to 28 U.S.C. §1367(a).

¹ These answers are made by and are applicable only to Defendant, as defined herein. No answer or other response, either express or implied, is made or intended with respect to the unknown and unnamed individuals and entities included in the collective term “Defendants” contained in the allegations of the Complaint.

4. Defendant denies the allegations contained in Paragraph 4 of the Complaint.

5. Defendant denies the allegations contained in Paragraph 5 of the Complaint, except admits that Plaintiffs purport to assert jurisdiction pursuant to Rule 4 of the Federal Rules of Civil Procedure.

6. Defendant denies the allegations contained in Paragraph 6 of the Complaint, except admits that Plaintiffs purport to assert proper venue pursuant to 28 U.S.C. §1391(b).

7. Defendant admits the allegations contained in Paragraph 7 of the Complaint.

8. Defendant admits the allegations contained in Paragraph 8 of the Complaint.

9. Defendant admits the allegations contained in Paragraph 9 of the Complaint.

10. Defendant admits the allegations contained in Paragraph 10 of the Complaint.

11. To the extent they pertain to Defendant or her alleged activities, Defendant denies the allegations contained in Paragraph 11 of the Complaint. To the extent they pertain to unknown and unnamed individuals or entities, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the Complaint.

FACTUAL ALLEGATIONS

12. Defendant admits the allegations contained in Paragraph 12 of the Complaint.

13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the Complaint.

14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the Complaint.

15. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint.

16. Defendant admits the allegations contained in Paragraph 16 of the Complaint as of the date shown on the printouts contained in Exhibit 1 to the Complaint.

17. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint.

18. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the Complaint.

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Complaint.

20. Defendant admits the allegations contained in Paragraph 20 of the Complaint.

21. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint.

22. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Complaint.

23. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of the Complaint.

24. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the Complaint.

25. Defendant denies the allegations contained in Paragraph 25 of the Complaint.

26. Defendant denies the allegations contained in Paragraph 26 of the Complaint.

27. Defendant denies the allegations contained in Paragraph 27 of the Complaint.

28. Defendant denies the allegations contained in Paragraph 28 of the Complaint.

29. Defendant admits the allegations contained in Paragraph 29 of the Complaint.

30. Defendant denies the allegations contained in Paragraph 30 of the Complaint.

- 31. Defendant denies the allegations contained in Paragraph 31 of the Complaint.
- 32. Defendant denies the allegations contained in Paragraph 32 of the Complaint.
- 33. Defendant denies the allegations contained in Paragraph 33 of the Complaint.
- 34. Defendant denies the allegations contained in Paragraph 34 of the Complaint.
- 35. Defendant denies the allegations contained in Paragraph 35 of the Complaint.
- 36. Defendant denies the allegations contained in Paragraph 36 of the Complaint.
- 37. Defendant denies the allegations contained in Paragraph 37 of the Complaint.
- 38. Defendant denies the allegations contained in Paragraph 38 of the Complaint.
- 39. Defendant denies the allegations contained in Paragraph 39 of the Complaint.
- 40. Defendant denies the allegations contained in Paragraph 40 of the Complaint.

FIRST CLAIM FOR RELIEF

41. Defendant reasserts and incorporates by reference her answers to all prior allegations as if fully set forth herein.

- 42. Defendant denies the allegations contained in Paragraph 42 of the Complaint.
- 43. Defendant denies the allegations contained in Paragraph 43 of the Complaint.
- 44. Defendant denies the allegations contained in Paragraph 44 of the Complaint.
- 45. Defendant denies the allegations contained in Paragraph 45 of the Complaint.
- 46. Defendant denies the allegations contained in Paragraph 46 of the Complaint.
- 47. Defendant denies the allegations contained in Paragraph 47 of the Complaint.
- 48. Defendant denies the allegations contained in Paragraph 48 of the Complaint.

SECOND CLAIM FOR RELIEF

49. Defendant reasserts and incorporates by reference her answers to all prior allegations as if fully set forth herein.

50. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of the Complaint.

51. Defendant denies the allegations contained in Paragraph 51 of the Complaint.

52. Defendant denies the allegations contained in Paragraph 52 of the Complaint.

53. Defendant denies the allegations contained in Paragraph 53 of the Complaint.

54. Defendant denies the allegations contained in Paragraph 54 of the Complaint.

55. Defendant denies the allegations contained in Paragraph 55 of the Complaint.

56. Defendant denies the allegations contained in Paragraph 56 of the Complaint.

57. Defendant denies the allegations contained in Paragraph 57 of the Complaint.

58. Defendant denies the allegations contained in Paragraph 58 of the Complaint.

THIRD CLAIM FOR RELIEF

59. Defendant reasserts and incorporates by reference her answers to all prior allegations as if fully set forth herein.

60. Defendant denies the allegations contained in Paragraph 60 of the Complaint.

61. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61 of the Complaint.

62. Defendant denies the allegations contained in Paragraph 62 of the Complaint.

63. Defendant denies the allegations contained in Paragraph 63 of the Complaint.

64. Defendant denies the allegations contained in Paragraph 64 of the Complaint.

65. Defendant denies the allegations contained in Paragraph 65 of the Complaint.

66. Defendant denies the allegations contained in Paragraph 66 of the Complaint.

FOURTH CLAIM FOR RELIEF

67. Defendant reasserts and incorporates by reference her answers to all prior allegations as if fully set forth herein.

- 68. Defendant denies the allegations contained in Paragraph 68 of the Complaint.
- 69. Defendant denies the allegations contained in Paragraph 69 of the Complaint.
- 70. Defendant denies the allegations contained in Paragraph 70 of the Complaint.
- 71. Defendant denies the allegations contained in Paragraph 71 of the Complaint.
- 72. Defendant denies the allegations contained in Paragraph 72 of the Complaint.
- 73. Defendant denies the allegations contained in Paragraph 73 of the Complaint.

AFFIRMATIVE DEFENSES

74. The Complaint fails, in whole or in part, to state a claim for which relief may be granted.

75. Plaintiffs are barred from seeking the relief requested, in whole or in part, by the doctrine of unclean hands.

76. Defendant reserves the right to assert any additional defenses or counterclaims that may be revealed through discovery.

Dated: February 25, 2011

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